

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

ERIC BLINMAN,

Plaintiff,

v.

CASE No. 1:23-cv-00431-KG-JMR

GOVERNOR MICHELLE LUJAN GRISHAM, et al.,

Defendants.

**MOTION FOR ENTRY OF
STIPULATED CONFIDENTIALITY ORDER**

COMES NOW, all parties in this case and, pursuant to Fed. R. Civ. P. 26(c), state the following:

1. All parties are in possession of documents and other materials that are confidential. Such materials are or may be subject to discovery and disclosure in this case.
2. Pursuant to Fed. R. Civ. P. 26(c), the parties request that this Court enter a Stipulated Confidentiality Order to protect certain confidential materials from public disclosure.
3. The Confidentiality Order is necessary to allow the parties to this litigation to obtain and use confidential information for the purpose of this litigation while preventing unauthorized disclosures of confidential information.
4. The parties have agreed to be bound by the terms of the Confidentiality Order governing the use and disclosure of such information.
5. The requested Order only applies to pretrial disclosure and post-trial return of confidential materials. The documents may be proposed as trial exhibits by any of the parties, and

the use of the documents as trial exhibits shall be governed by the Court's evidentiary rulings, and any substantive law which may be applicable.

6. A proposed Confidentiality Order is attached to this Motion. It has been approved by counsel for all parties.

WHEREFORE, the parties respectfully request that this Court enter the parties' Confidentiality Order filed contemporaneously with this Motion.

Respectfully submitted,

SERPE | ANDREWS, PLLC

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Approved by:

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By /s/ Electronically on April 18, 2025
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I hereby certify that the foregoing was electronically served through the CM/ECF system on this 21st day of April, 2025 to all counsel of record.

/s/ Cody R. Rogers
Cody R. Rogers